

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION

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In Re:

**Sharon Higgs-Diggs**

Case No. 15-80767

Chapter 13

Social Security No.: xxx-xx-7735

Address: 11 Alexis Court, Durham, NC 27703-

Debtor

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**RESPONSE TO MOTION**

The Debtor, by and through the attorney undersigned, hereby responds to the motion to allow Alexander Crossing HOA, Inc. a secured claim filed by the Chapter 13 Trustee, and dated 10/9/15, as follows:

The Debtor respectfully requests that this matter be set for hearing. The Debtor has filed an objection to the proof of claim filed by Alexander Crossing HOA, Inc., objecting to the secured status of the claim.

WHEREFORE, the Debtor prays the Court set this matter for hearing and grant such other relief as to the Court may seem just and proper.

Dated: November 4, 2015

**LAW OFFICES OF JOHN T. ORCUTT, P.C.**

/s Edward Boltz

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Edward Boltz

N.C. State Bar No. 23003

1738-D Hillandale Road

Durham, NC 27705

Telephone: (919) 286-1695

Fax: (919) 286-2704

Email: eboltz@johnorcutt.com

CERTIFICATE OF SERVICE

I, Erica NeSmith, of the Law Offices of John T. Orcutt, P.C., certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; that on November 4, 2015, I served copies of the foregoing Response to Motion electronically or, when unavailable, by regular U.S. mail, upon the following parties (names and addresses):

Sharon Higgs-Diggs  
11 Alexis Court  
Durham, NC 27703-

Richard M. Hutson, II  
Chapter 13 Trustee  
P.O. Box 3613  
Durham, N.C. 27702-3613

ALEXANDER CROSSING HOA, INC.  
**Attn: Managing Agent**  
C/O F. Todd Whitlow  
Brownlee Law Firm, PLLC  
4020 Westchase Blvd., Ste. 530  
Raleigh, NC 27607-

ALEXANDER CROSSING HOA, INC.  
**Attn: Managing Agent**  
1500 Sunday Dr., Ste. 113  
Raleigh, NC 27607-

ALEXANDER CROSSING HOA, INC.  
**Attn: Registered Agent Edward J. Bedford**  
5915 Farrington Rd., Ste. 104  
Chapel Hill, NC 27517

/s Erica NeSmith  
Erica NeSmith